6995 Camino Amero San Diego, CA 92111 June 22, 1998

JUN 26 1998

CALFED Bay-Delta Program 1416 Ninth Street, Suite 1155 Sacramento, CA 95814 Attn: Rick Breitenbach

Subject: Comments on the CALFED Bay-Delta Program Draft Programmatic EIS/EIR

Dear Mr. Breitenbach:

In my view of the CALFED Bay-Delta Program, the highest priority should be placed on water conservation and the protection of the environment. Before any other steps are taken in committing funds for the program, CALFED should get all the water users to sign up to the Urban and Agricultural MOU's.

The Technical Appendix Water Use Efficiency Component indicates the numbers of the water agencies signed up to the MOU's in each of the agricultural and urban districts. However, it does not give the numbers of the agencies not subscribing to these MOU's. Consequently, it is not readily apparent to the reader what the percentage of the water agencies are still not committed to water conservation. A CALFED goal is be equitable. It does not seem equitable if there are any water users not committed to conservation. The EIS/EIR discusses in many instances that water agencies in order to qualify for "new" water must abide by the prescribed requirements. Does this mean that those agencies not meeting these requirements would still be eligible for the water that they have historically been receiving? The assurances that the water use efficiency goals are met should include financial incentives as well as penalties that can be administered to the water agencies using the Delta waters.

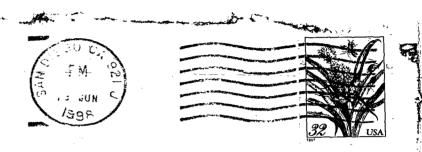
One area that should be addressed in the section on water recycling is water quality. The City of San Diego is mandated by the Ocean Pollution Reduction Act to produce 45 mgd of recycled (Title 22) water. In order for the recycled water to be usable for irrigation, the salt content must be sufficiently low (TDS < 900 or so). This means that the TDS of the raw water must be below 500. Since we rely heavily on the Colorado River water, SWP water is must be blended in to reduce the TDS. It should be noted that sections of California with lower TDS have by far the lowest planned volume of recycled water. (Table 6.3 of the Water Use Efficiency Component)

Sincerely,

Edward Kimura

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Edward M. Kimura 6995 Camino Amero San Diego, CA 92111



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